THE HONORABLE BARBARA J. ROTHSTEIN

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UNOPPOSED MOTION TO EXTEND TIME (No. 2:21-cv-01157-BJR) - 1

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON

VALERIE ROGOFF, for herself and others similarly situated,

Plaintiff,

v.

T-MOBILE USA, INC.,

Defendant.

No. 2:21-cv-01157-BJR

UNOPPOSED MOTION AND PROPOSED ORDER TO EXTEND TIME TO ANSWER COMPLAINT

Under Western District of Washington Local Rules 7(d)(1) and 10(g), Defendant T-Mobile USA, Inc., moves the Court to extend T-Mobile's deadline to answer or otherwise respond to the Complaint in the above-captioned action for a total of 30 days through October 18, 2021. Plaintiff Valerie Rogoff does not oppose T-Mobile's requested relief.

Good cause exists for this extension. The Complaint contains 148 paragraphs and alleges seven separate counts. ECF No. 1. And as shown in Plaintiff's notices, more than 20 related cases have been filed in this District and elsewhere. ECF Nos. 8, 11. The additional 30 days will allow the parties to discuss global issues and provide T-Mobile time to investigate the allegations in the Complaint. This is the first request for an extension.

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<sup>&</sup>lt;sup>1</sup> Thirty days from T-Mobile's current response deadline is Sunday, October 17, 2021. *See* ECF No. 10 (service of process dated August 26, 2021); Fed. R. Civ. P. 12(a). So T-Mobile's new deadline would "run until the end of the next day that is not a Saturday, Sunday, or legal holiday." Fed. R. Civ. P. 6(a)(1)(C).

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UNOPPOSED MOTION TO EXTEND TIME (No. 2:21-cv-01157-BJR) - 2

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1	ORDER	
2	IT IS SO ORDERED.	
3	Dated this 16th day of September 2021.	
4		
5		s/Barbara J. Rothstein Barbara J. Rothstein
6		U.S. District Court Judge
7	Presented by:	
8	Fresented by.	
9	By: <u>/s/ Steve Y. Koh</u> Steve Y. Koh, WSBA No. 23284	
10	Kathleen M. O'Sullivan, WSBA No. 27850 Lauren J. Tsuji, WSBA No. 55839 PERKINS COIE LLP	
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UNOPPOSED MOTION TO EXTEND TIME

(No. 2:21-cv-01157-BJR) - 3